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Representing Lenders in
New Jersey

June 6, 2019

Judge Rosemary Gambardella

RE: FRANKLIN MEDINA

Case No. 18-11629 RG – 212 214 65TH Street, West New York, NJ 07093

Our File No. NJID 825487

Dear Judge Gambardella:

The Lender's Motion for Relief was filed on September 10, 2018 (See, Docket Entry #47). At the October 2, 2018 hearing, the parties advised the Court that an agreement had been reached and an Order would be submitted. Subsequently, Order Resolving Motion for Relief was entered on January 14, 2019 (See, Docket Entry #58) and per terms of said Order, the Debtor was to resume making their regular monthly payments pursuant to the Note and Mortgage starting on November 1, 2018 and said payments were subject to a 30-day default clause. The Order Resolving Motion for Relief further provided that should the Debtor fail to make their regular monthly payments pursuant to the Note and Mortgage, Secured Creditor is entitled to re-list the Motion for Relief from the Automatic Stay to pursue the entire post-petition delinquency. As of May 28, 2019, Debtor has become delinquent with their post-petition owed to Secured Creditor pursuant to the Note and Mortgage.

Based upon the above, I respectfully request that the Court please immediately re-list the Motion for Relief for a hearing to allow our client pursue relief from the automatic stay.

Thank you for your attention to this matter.

Respectfully submitted,
/s/ Nicholas V. Rogers
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